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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF JOINT SUBMISSION IN
RESPONSE TO DKT. 447-1 RE
PLAINTIFFS' REQUEST FOR IN
CAMERA SUBMISSION**

Judge: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion to Seal portions of parties’ Joint Submission in Response to Dkt. 447-
8 1 Re: Plaintiffs’ Request for In Camera Submission (“Joint Submission”). In making this request,
9 Google has carefully considered the relevant legal standard and policy considerations outlined in
10 Civil Local Rule 79-5. Google makes this request with the good faith belief that the information
11 sought to be sealed consists of Google’s confidential and proprietary information and that public
12 disclosure could cause competitive harm.

13 3. The aforementioned all comprise confidential and proprietary information as the
14 materials involve highly sensitive features of Google’s internal systems and operations that Google
15 does not share publicly and maintains as confidential in the ordinary course of its business and is
16 not generally known to the public or Google’s competitors. Specifically, this information provides
17 details related to various types of Google’s internal data signals and logs and their proprietary
18 functionalities. Such information reveals Google’s internal strategies, system designs, and business
19 practices for operating and maintaining many of its important services while complying with legal
20 and privacy obligations.

21 4. Public disclosure of the above-listed information would harm Google’s competitive
22 standing it has earned through years of innovation and careful deliberation, by revealing sensitive
23 aspects of Google’s proprietary systems, strategies, and designs to Google’s competitors, allowing
24 them to alter their own plans for product development and/or commercialization, time strategic
25 litigation, focus their patent prosecution strategies, or otherwise unfairly compete with Google.

26 5. For these reasons, Google respectfully requests that the portions of the Joint
27 Submission identified in Google’s Administrative Motion to Seal to be filed under seal.

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1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in San Francisco, California on March 4, 2022.

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4 DATED: March 4, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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7 By /s/ Jonathan Tse

Jonathan Tse

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9 *Attorney for Defendant*
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